Remarks

The Advisory Action mailed August 20, 2007 and the Final Office Action mailed March 22, 2007 have been carefully reviewed and the foregoing amendment has been made in consequence thereof.

Claims 1-33 and 39-42 are pending in this application. Claims 1-33 and 39-42 stand rejected. Claims 34-38 and 43-45 were previously cancelled.

Applicants and the undersigned wish to express their appreciation to the Examiner for the courtesies he extended during a telephone interview that occurred on August 21, 2007. During the interview, the Advisory Action dated August 20, 2007 and a related application, now issued as U.S. Patent No. 7,216,102 (the '102 patent), were discussed. The Examiner indicated that the claims of the instant application would be allowable if they were amended to include a recitation directed to *auctioning* customer lists. The foregoing amendment has been made in consequence of the interview.

Accordingly, in light of the fact that the Patent Office has already allowed the '102 patent, which is a sister-case to the present application, Applicants respectfully submit that after entry of the foregoing amendments, the instant application is in condition for allowance.

For at least the reasons set forth above, Applicants respectfully submit that all pending claims in the instant application are in condition for allowance.

Furthermore, the rejection of Claims 1-33 and 39-42 under 35 U.S.C. § 112, first paragraph, for failing to comply with the written description requirement is respectfully traversed. Applicants respectfully traverse the assertion that adequate support for the step of "providing financing for the one or more dealers to a customer from the customer lead list that purchases a product from the one or more dealers, the financing provided by the business entity" is not found in the specification. At paragraph 28 the application describes, "[b]y offering lists of high probability customers to a dealer of products, a lender is in a position to secure the financing of the products." Paragraph 75 recites that, "dealers with such customer information

would typically market to these prospective customers to invite them to buy their products and take a loan through the dealer from the lender that has provided the modeled prospective customer list." Also, the application recites at paragraph 77 that, "[t]he lender auctions pre-selected customer lists to businesses (i.e., dealers) who in turn lets the lender finance the purchase of the products for the customers." Claims 2-10, 12-20, 22-25, 27-29, 31-33, and 40-42 depend from Claims 1, 11, 21, 26, 30, and 39. Accordingly, Applicants submit that Claims 1-33 and 39-42 satisfy section 112, first paragraph. For at least the reasons set forth above, Applicants respectfully request that the rejection of Claims 1-33 and 39-42 under 35 U.S.C. § 112, first paragraph, be withdrawn.

The rejection of Claims 1-33 and 39-42 under 35 U.S.C. § 103(a) as being unpatentable over Gary Saarenvirta's "Data Mining for Direct Mail: A Lesson in Predictive Modeling" ("Saarenvirta"), and further in view of Anderson et al. (U.S. Patent No. 6,078,892) ("Anderson") and Blume et al. (U.S. Patent No. 6,839,682) ("Blume") is respectfully traversed.

Applicants respectfully submit that none of Saarenvirta, Anderson, and Blume, considered alone or in combination, describe or suggest the claimed invention. As discussed below, at least one of the differences between the cited references and the present invention is that no combination of Saarenvirta, Anderson, and Blume describes or suggests a method for generating customer leads for use by dealers attempting to sell a product to a plurality of customers, the customer leads are provided to the dealers by a business entity engaged in a business of providing financing, wherein the method includes *providing financing for one or more dealers to a customer from a customer lead list that purchases a product from one or more dealers wherein the financing is provided by the business entity*. (Emphasis added.)

Saarenvirta describes a method for data mining to target customers for a direct-mail campaign by using a predictive model. Other models such as attrition, lifetime value, credit risk, and fraud may also be used to mine data to target customers. The method using a predictive model includes establishing business requirements; designing a campaign; targeting a mailing; designing a mailing piece; designing the campaign's execution; implementing the campaign; tracking the results; and analyzing the results. During the design of the execution, the model

gives each customer a score indicating that customer's probability of responding. Determining the predictive model that the method will use includes the steps of: data selection, data preparation, feature selection, model building and testing, results analysis, population stability testing, and model application. In the data selection step, a customer universe is chosen, typically made up of active customers and the customers' purchase and demographic information.

Anderson describes a method for retrieving customer lead information from a marketing database. The method includes, as an initial step, assigning scores to customer records in the database. Each of the scores is computed based on a comparison between information in a respective one of the customer records and the product of interest, which scores are then assigned as a quantitative indication of a likelihood of a match between the records and the product. Sales agents may then customize the method by specifying zero or more preferences reflecting the type of customer that they would like to do business with, e.g., if the agent likes to work with persons of a particular age he may enter an appropriate age range as a preference. After these steps, the method includes searching the database to locate, as a collection of records, customer records which satisfy the one or more preferences specified. The records in the collection are then ordered based on the scores assigned to them in the initial step, and then a predetermined number of them (e.g., the highest-scored records) are output to identify the best customer leads for the product specified and the preferences given. The agent then may select those records which he would like to pursue.

Blume describes predictive modeling of consumer financial behavior using supervised segmentation and nearest-neighbor matching. The method determines likely responses to particular marketing efforts. The method includes applying consumer transaction data to predictive models associated with merchant segments. The merchant segments are derived from the consumer transaction data based on co-occurrences of merchants in sequences of transactions. Merchant vectors represent specific merchants, and are aligned in a vector space as a function of the degree to which the merchants co-occur more or less frequently than expected. Consumer vectors are developed within the vector space, to represent interests of particular consumers by virtue of relative vector positions of consumer and merchant vectors. Various

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techniques, including clustering, supervised segmentation, and nearest-neighbor analysis, are applied separately or in combination to generate improved predictions of consumer behavior.

Claim 1 recites a method for generating customer leads for use by dealers attempting to sell a product to a plurality of customers using a computer coupled to a database, the customer leads provided to the dealers through an auction process by a business entity engaged in a business of providing financing, the method including the steps of, "storing customer information within the database including age, gender, income and payment history for each of the plurality of customers including inactive customers, wherein an inactive customer is a customer that purchased a product from at least one of the dealers and is currently not a party to a loan for financing the purchased product . . . applying propensity models using the computer to one or more customers stored within the database, the propensity models including an early termination model and a cross-selling model, the early termination model for predicting a probability of early termination of a loan by the one or more customers wherein early termination includes a likelihood a customer will terminate a loan provided by the dealer before a contract life of the loan expires by prepaying the loan, the cross-selling model for predicting a probability of cross-selling to a predicted early termination customer wherein cross-selling includes a likelihood a customer will purchase another product from the dealer to retain the early termination customer as an active customer of the dealer . . . applying an activation model and a timing model using the computer to one or more customers stored within the database, the activation model for predicting a probability of activating the one or more customers stored within the database including a likelihood that an inactive customer will accept an offer to sell a product from the dealer and become an active customer, the timing model for predicting when the customers will accept the offer, wherein an active customer is a customer that is currently a party to a loan used for purchasing a product from at least one of the dealers . . . generating for the business entity a customer lead list including customers satisfying the early termination model and the cross-selling model, or satisfying the activation model, wherein an early termination customer satisfying the cross-selling model is an early termination customer predicted to purchase another product from the dealer, and a customer satisfying the activation model is an inactive customer predicted to accept an offer to sell a product from the dealer . . .

auctioning the customer lead list to one or more dealers . . . and providing financing for the one or more dealers to a customer from the customer lead list that purchases a product from the one or more dealers, the financing provided by the business entity."

Applicants agree with the statement at page 9, paragraph 3 of the instant Office Action that, "[t]he combined teachings of Saarenvirta, Anderson et al. and Blume et al. do not explicitly teach the step of providing financing for the one or more dealers to a customer from the customer lead list that purchases a product from the one or more dealers, the financing provided by the business entity." However, Applicants respectfully traverse the Official Notice taken that:

> [I]t is old and well known in the art for dealers to provide financing to customers of a business as an incentive to purchase a product offering. Therefore, it would have been obvious to one of ordinary skill in the art at the time of invention to modify the combined teachings of Saarenvira, Anderson et al. and Blume et al. to include the step of providing financing to a customer, because doing so would allow Saarenvirta to cross sell products (such as financial services) via a direct-mail campaign to those customers most likely to respond, which is a goal of Saarenvirta [Paragraph 10], thereby extending the customer relationship.

Claim 1 does not recite a dealer providing financing to customers of a business as an incentive to purchase a product offering. Rather, Claim 1 recites a method for generating customer leads for use by dealers wherein the customer leads are provided to the dealers through an auction process by a business entity engaged in a business of providing financing, the method including providing financing for the one or more dealers to a customer from the customer lead list that purchases a product from the one or more dealers, the financing provided by the business entity.

Furthermore, MPEP § 2144.03 states, "Official notice without documentary evidence to support an examiner's conclusion is permissible only in some circumstances. While 'official notice' may be relied on, these circumstances should be rare when an application is under final rejection or action under 37 CFR 1.113. Official notice unsupported by documentary evidence should only be taken by the examiner where the facts asserted to be well-known, or to be common knowledge in the art are capable of instant and unquestionable demonstration as being well-known. . . . If applicant adequately traverses the examiner's assertion of official notice, the examiner must provide documentary evidence in the next Office action if the rejection is to be

maintained." Applicants respectfully request removal of the finality of the instant Office Action and that the Examiner provide documentary evidence to support the Official Notice relied upon to support this rejection.

Furthermore, none of Saarenvirta, Anderson, and Blume, considered alone or in combination, describe or suggest a method that includes *a propensity model that includes an early termination model and a cross-selling model*, the *early termination model for predicting a probability of early termination of a loan by the one or more customers* wherein early termination includes a likelihood a customer will terminate a loan provided by the dealer before a contract life of the loan expires by prepaying the loan. (Emphasis added.)

Moreover, none of Saarenvirta, Anderson, and Blume, considered alone or in combination, describe or suggest a method that includes applying an activation model and a timing model to one or more customers stored within the database, the *activation model for predicting a probability of activating the one or more customers* stored within the database *including a likelihood that an inactive customer will accept an offer to sell a product from the dealer and become an active customer,* and *the timing model for predicting when the customers will accept the offer.* (Emphasis added.)

Further, none of Saarenvirta, Anderson, and Blume, considered alone or in combination, describe or suggest a method that includes *an inactive customer that is a customer that purchased a product from at least one of the dealers and is currently not a party to a loan for financing the purchased product; or an active customer that is a customer that is currently a party to a loan used for purchasing a product from at least one of the dealers.* (Emphasis added.)

In addition, none of Saarenvirta, Anderson, and Blume, considered alone or in combination, describe or suggest a method that includes generating for the business entity a *customer lead list including customers satisfying the early termination model and the cross-selling model, or satisfying the activation model,* wherein an early termination customer satisfying the cross-selling model is an early termination customer predicted to purchase another

product from the dealer, and a customer satisfying the activation model is an inactive customer predicted to accept an offer to sell a product from the dealer. (Emphasis added.)

Although Saarenvirta describes a method for data mining to target customers by using a predictive model, Saarenvirta does not describe or suggest applying propensity models that include an early termination model and a cross-selling model wherein the early termination model is for predicting a probability of early termination of a loan by the one or more customers, and the cross-selling model is for predicting a probability of cross-selling to a predicted early termination customer. In fact, Saarenvirta does not mention loans of any kind. Moreover, Saarenvirta does not describe or suggest applying an activation model and a timing model, wherein the activation model is for predicting a probability of activating the one or more customers, including a likelihood that an inactive customer will become an active customer, and the timing model is for predicting when the customers will accept the offer. Furthermore, Saarenvirta does not describe an active customer as a customer that is currently a party to a loan used for purchasing a product from at least one of the dealers, and an inactive customer as a customer that purchased a product from at least one of the dealers and is currently not a party to a loan for financing the purchased product.

Anderson describes a method for retrieving customer lead information from a marketing database, and Blume describes predictive modeling of consumer financial behavior, but neither Anderson nor Blume, considered alone or in combination make up for the deficiencies of Saarenvirta. More specifically, none of Saarenvirta, Anderson, and Blume, alone or in combination, describe or suggest *providing financing for one or more dealers to a customer from a customer lead list that purchases a product from one or more dealers where the financing is provided by the business entity* as recited in Claim 1.

For at least the reasons as set forth above, Applicants respectfully request that the 35 U.S.C. § 103(a) rejection of Claim 1 be withdrawn.

Claims 2-10 depend from independent Claim 1 which is submitted to be in condition for allowance. When the recitations of Claims 2-10 are considered in combination with the

recitations of Claim 1, Applicants submit that dependent Claims 2-10 are also patentable over Saarenvirta, further in view of Anderson and Blume.

Claim 11 recites a system for generating customer leads for use by dealers attempting to sell a product to a plurality of customers, the customer leads provided to the dealers through an auction process by a business entity engaged in a business of providing financing, the system including, "one or more databases of customer information, the customer information including age, gender, income and payment history for each of the plurality of customers including inactive customers, wherein an inactive customer is a customer that purchased a product from at least one of the dealers and is currently not a party to a loan for financing the purchased product . . . a server comprising a plurality of models including propensity models, an activation model, and a timing model, wherein the propensity models include at least one of an early termination model and a cross-selling model . . . a network . . . and at least one computer connected to said server via said network, said server configured to . . . apply the propensity models to one or more customers stored within the database, the early termination model for predicting a probability of early termination of a loan by the one or more customers wherein early termination includes a likelihood a customer will terminate a loan provided by the dealer before a contract life of the loan expires by prepaying the loan, the cross-selling model for predicting a probability of cross-selling to a predicted early termination customer wherein cross-selling includes a likelihood a customer will purchase another product from the dealer to retain the early termination customer as an active customer of the dealer, wherein an active customer is a customer that is currently a party to a loan used for purchasing a product from at least one of the dealers . . . apply an activation model and a timing model to one or more customers stored within the database, the activation model for predicting a probability of activating the one or more customers stored within the database including a likelihood that an inactive customer will accept an offer to sell a product from the dealer and become an active customer, the timing model for predicting when the customers will accept the offer . . . generate for the business entity a customer lead list including customers satisfying the early termination model and the cross-selling model, or satisfying the activation model, wherein an early termination customer satisfying the cross-selling model is an early termination customer predicted to purchase another product from the

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dealer, and a customer satisfying the activation model is an inactive customer predicted to accept an offer to sell a product from the dealer . . . provide the customer lead list to one or more dealers selected through the auction process . . . and determine that financing is to be provided by the business entity for the one or more dealers to a customer from the customer lead list that purchases a product from the one or more dealers."

Claim 11 recites a system comprising, among other things, a server configured to perform steps essentially similar to those recited in Claim 1. Thus, it is submitted that Claim 11 is patentable over the combination of Saarenvirta with Anderson and Blume for reasons that correspond to those given with respect to Claim 1.

For at least the reasons as set forth above, Applicants respectfully request that the 35 U.S.C. § 103(a) rejection of Claim 11 be withdrawn.

Claims 12-20 depend from independent Claim 11 which is submitted to be in condition for allowance. When the recitations of Claims 12-20 are considered in combination with the recitations of Claim 11, Applicants submit that dependent Claims 12-20 are also patentable over Saarenvirta, further in view of Anderson and Blume.

Claim 21 recites a computer for generating customer leads for use by dealers attempting to sell a product to a plurality of customers, the computer having a processor and a display, the computer coupled to a database, the customer leads provided to the dealers through an auction process by a business entity engaged in a business of providing financing, the computer programmed to, "store customer information within the database including age, gender, income and payment history for each of the plurality of customers including inactive customers, wherein an inactive customer is a customer that purchased a product from at least one of the dealers and is currently not a party to a loan for financing the purchased product . . . apply propensity models to one or more customers stored within the database, the propensity models including an early termination model and a cross-selling model, the early termination model for predicting a probability of early termination of a loan by the one or more customers wherein early termination includes a likelihood a customer will terminate a loan provided by the dealer before

a contract life of the loan expires by prepaying the loan, the cross-selling model for predicting a probability of cross-selling to a predicted early termination customer wherein cross-selling includes a likelihood a customer will purchase another product from the dealer to retain the early termination customer as an active customer of the dealer, wherein an active customer is a customer that is currently a party to a loan used for purchasing a product from at least one of the dealers . . . apply an activation model and a timing model to one or more customers stored within the database, the activation model for predicting a probability of activating the one or more customers stored within the database including a likelihood that an inactive customer will accept an offer to sell a product from the dealer and become an active customer, the timing model for predicting when the customers will accept the offer . . . generate for the business entity a customer lead list including customers satisfying the early termination model and the cross-selling model, or satisfying the activation model, wherein an early termination customer satisfying the cross-selling model is an early termination customer predicted to purchase another product from the dealer, and a customer satisfying the activation model is an inactive customer predicted to accept an offer to sell a product from the dealer . . . and determine that financing is to be provided by the business entity for one or more dealers selected through the auction process to a customer from the customer lead list that purchases a product from the one or more dealers."

Claim 21 recites a computer programmed to perform steps essentially similar to those recited in Claim 1. Thus, it is submitted that Claim 21 is patentable over the combination of Saarenvirta with Anderson and Blume for reasons that correspond to those given with respect to Claim 1.

For at least the reasons as set forth above, Applicants respectfully request that the 35 U.S.C. § 103(a) rejection of Claim 21 be withdrawn.

Claims 22-25 depend from independent Claim 21 which is submitted to be in condition for allowance. When the recitations of Claims 22-25 are considered in combination with the recitations of Claim 21, Applicants submit that dependent Claims 22-25 are also patentable over Saarenvirta, further in view of Anderson and Blume.

Claim 26 recites a database for generating customer leads for use by dealers attempting to sell a product to a plurality of customers, the customer leads provided by a business entity to dealers selected through an auction process, the business entity engaged in a business of providing financing, the database including, "data corresponding to customer information including age, gender, income and payment history for each of the plurality of customers including inactive customers, wherein an inactive customer is a customer that purchased a product from at least one of the dealers and is currently not a party to a loan for financing the purchased product . . . data corresponding to applying propensity models to one or more customers stored within the database, the propensity models including an early termination model and a cross-selling model, the early termination model for predicting a probability of early termination of a loan by the one or more customers wherein early termination includes a likelihood a customer will terminate a loan provided by the dealer before a contract life of the loan expires by prepaying the loan, the cross-selling model for predicting a probability of cross-selling to a predicted early termination customer wherein cross-selling includes a likelihood a customer will purchase another product from the dealer to retain the early termination customer as an active customer of the dealer, wherein an active customer is a customer that is currently a party to a loan used for purchasing a product from at least one of the dealers . . . data corresponding to applying an activation model and a timing model using the computer to one or more customers stored within the database, the activation model for predicting a probability of activating the one or more customers stored within the database including a likelihood that an inactive customer will accept an offer to sell a product from the dealer and become an active customer, the timing model for predicting when the customers will accept the offer . . . data corresponding to generating for the business entity a customer lead list including customers satisfying the early termination model and the cross-selling model, or satisfying the activation model, wherein an early termination customer satisfying the cross-selling model is an early termination customer predicted to purchase another product from the dealer, and a customer satisfying the activation model is an inactive customer predicted to accept an offer to sell a product from the dealer . . . and data corresponding to determining that financing is to be provided by the business entity for one or more dealers selected through the auction process to a customer from the customer lead list that purchases a product from the one or more dealers."

Claim 26 recites a database including data corresponding to steps essentially similar to those recited in Claim 1. Thus, it is submitted that Claim 26 is patentable over the combination of Saarenvirta with Anderson and Blume for reasons that correspond to those given with respect to Claim 1.

For at least the reasons as set forth above, Applicants respectfully request that the 35 U.S.C. § 103(a) rejection of Claim 26 be withdrawn.

Claims 27-29 depend from independent Claim 26 which is submitted to be in condition for allowance. When the recitations of Claims 27-29 are considered in combination with the recitations of Claim 26, Applicants submit that dependent Claims 27-29 are also patentable over Saarenvirta, further in view of Anderson and Blume.

Claim 30 recites a computer program embodied on a computer readable medium for generating customer leads for use by dealers attempting to sell a product to a plurality of customers, the customer leads provided to the dealers through an auction process by a business entity engaged in a business of providing financing, the program including at least one code segment that prompts a user to input customer information and then, "stores the customer information within a database including age, gender, income and payment history for each of the plurality of customers including inactive customers, wherein an inactive customer is a customer that purchased a product from at least one of the dealers and is currently not a party to a loan for financing the purchased product . . . applies propensity models using the computer to one or more customers stored within the database, the propensity models including an early termination model and a cross-selling model, the early termination model for predicting a probability of early termination of a loan by the one or more customers wherein early termination includes a likelihood a customer will terminate a loan provided by the dealer before a contract life of the loan expires by prepaying the loan, the cross-selling model for predicting a probability of cross-selling to a predicted early termination customer wherein cross-selling includes a likelihood a customer will purchase another product from the dealer to retain the early termination customer as an active customer of the dealer, wherein an active customer is a customer that is currently a party to a loan used for purchasing a product from at least one of the dealers . . . applies an

activation model and a timing model using the computer to one or more customers stored within the database, the activation model for predicting a probability of activating the one or more customers stored within the database including a likelihood that an inactive customer will accept an offer to sell a product from the dealer and become an active customer, the timing model for predicting when the customers will accept the offer . . . generates for the business entity a customer lead list including customers satisfying the early termination model and the cross-selling model, or satisfying the activation model, wherein an early termination customer satisfying the cross-selling model is an early termination customer predicted to purchase another product from the dealer, and a customer satisfying the activation model is an inactive customer predicted to accept an offer to sell a product from the dealer . . . and determines that financing is to be provided by the business entity for one or more dealers selected through the auction process to a customer from the customer lead list that purchases a product from the one or more dealers."

Claim 30 recites a computer program embodied on a computer readable medium for generating customer leads for use by dealers attempting to sell a product to a plurality of customers that includes at least one code segment programmed to perform steps essentially similar to those recited in Claim 1. Thus, it is submitted that Claim 30 is patentable over the combination of Saarenvirta with Anderson and Blume for reasons that correspond to those given with respect to Claim 1.

For at least the reasons as set forth above, Applicants respectfully request that the 35 U.S.C. § 103(a) rejection of Claim 30 be withdrawn.

Claims 31-33 depend from independent Claim 30 which is submitted to be in condition for allowance. When the recitations of Claims 31-33 are considered in combination with the recitations of Claim 30, Applicants submit that dependent Claims 31-33 are also patentable over Saarenvirta, further in view of Anderson and Blume.

Claim 39 recites an apparatus for generating customer leads for use by dealers attempting to sell a product to a plurality of customers, the customer leads provided by a business entity to dealers selected through an auction process, the business entity engaged in a business of

providing financing, the apparatus including, "means for storing customer information within a database, the customer information including age, gender, income and payment history for each of the plurality of customers including inactive customers, wherein an inactive customer is a customer that purchased a product from at least one of the dealers and is currently not a party to a loan for financing the purchased product . . . means for applying propensity models to one or more customers stored within the database, the propensity models including an early termination model and a cross-selling model, the early termination model for predicting a probability of early termination of a loan by the one or more customers wherein early termination includes a likelihood a customer will terminate a loan provided by the dealer before a contract life of the loan expires by prepaying the loan, the cross-selling model for predicting a probability of cross-selling to a predicted early termination customer wherein cross-selling includes a likelihood a customer will purchase another product from the dealer to retain the early termination customer as an active customer of the dealer . . . means for applying an activation model and a timing model to one or more customers stored within the database, the activation model for predicting a probability of activating the one or more customers stored within the database including a likelihood that an inactive customer will accept an offer to sell a product from the dealer and become an active customer, the timing model for predicting when the customers will accept the offer, wherein an active customer is a customer that is currently a party to a loan used for purchasing a product from at least one of the dealers . . . means for generating for the business entity a customer lead list including customers satisfying the early termination model and the cross-selling model, or satisfying the activation model, wherein an early termination customer satisfying the cross-selling model is an early termination customer predicted to purchase another product from the dealer, and a customer satisfying the activation model is an inactive customer predicted to accept an offer to sell a product from the dealer . . . means for delivering the customer lead list to at least one dealer selected through the auction process . . . and means for determining that financing is to be provided by the business entity for the at least one dealer to a customer from the customer lead list that purchases a product from the at least one dealer."

Claim 39 recites an apparatus for generating customer leads that includes means for performing steps essentially similar to those recited in Claim 1. Thus, it is submitted that Claim

39 is patentable over the combination of Saarenvirta with Anderson and Blume for reasons that correspond to those given with respect to Claim 1.

For at least the reasons as set forth above, Applicants respectfully request that the 35 U.S.C. § 103(a) rejection of Claim 39 be withdrawn.

Claims 40-42 depend from independent Claim 39 which is submitted to be in condition for allowance. When the recitations of Claims 40-42 are considered in combination with the recitations of Claim 39, Applicants submit that dependent Claims 40-42 are also patentable over the combination of Saarenvirta with Anderson and Blume.

In addition, Applicants respectfully submit that the Section 103 rejection of the presently pending claims is not a proper rejection. As is well established, obviousness cannot be established by combining the teachings of the cited art to produce the claimed invention, absent some teaching, suggestion, or incentive supporting the combination. None of Saarenvirta, Anderson, and Blume, considered alone or in combination, describe or suggest the claimed combination.

Applicants submit that the presently claimed invention is not obvious over Saarenvirta in view of Anderson, and further in view of Blume. The Office Action only offers conclusory statements, such as "[i]t would have been obvious to one of ordinary skill in the art at the time of invention to modify the combined teachings of Saarenvirta, Anderson et al. and Blume et al. to include the step of providing financing to a customer." The United States Supreme Court has recently held that obviousness rejections must be supported with "articulated reasoning with some rational underpinning to support the conclusion of obviousness." See KSR International Co. v. Teleflex, Inc., slip Opinion at page 14. The present rejection does not appear to meet this standard, for example, as it reflects the Examiner's belief as to why the step of a dealer providing financing to a customer would be obvious, but not as to why the step of "providing financing for one or more dealers to a customer from the customer lead list that purchases a product from the one or more dealers, the financing provided by the business entity" as recited in Claim 1 and similarly in the other independent claims. Applicants accordingly request specific explanation

and articulation regarding the reasoning and rational underpinning for any obviousness rejection of the claims. It is not believed that adequate reasons why the presently claimed invention is believed to be obvious have been provided on the present record.

For at least the reasons set for above, Applicants respectfully request that the Section 103 rejection of Claims 1-33 and 39-42 be withdrawn.

In view of the foregoing amendments and remarks, all the claims now active in this application are believed to be in condition for allowance. Reconsideration and favorable action is respectfully solicited.

Respectfully Submitted,

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